

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	X	
	:	
In re	::	Chapter 9
	::	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	::	Hon. Thomas J. Tucker
Debtor.	:	
	X	

**STIPULATION FOR ORDER WITHDRAWING**  
**DPOA CLAIM #1869 AS MOOT**

The City of Detroit, Michigan (“City”) and the Detroit Police Officers Association (“DPOA”), by and through their undersigned counsel, hereby stipulate to the entry of an Order Confirming that Claim No. 1869 is resolved by the DPOA Collective Bargaining Agreement (“the DPOA CBA”), the City’s Confirmed Plan of Adjustment and the Parties’ July 27, 2017 Settlement Allowing Withdrawal of DPOA Claim No. 1869, as Moot, in the form attached as Exhibit A. In support of their request, the City and the DPOA state the following:

1. On February 20, 2014, the DPOA filed Claim No. 1869.
2. Claim No. 1869 was filed during ongoing Court-ordered mediation between the City and the DPOA in these Chapter 9 proceedings. Claim 1869 asserts DPOA members’ right to recovery for certain pre-petition grievances (the “Pre-petition Grievances”).
3. Through the mediation process, the City and the DPOA have entered into

and executed a settlement agreement with an effective date of July 27,  
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2017 with regard to, among other things, the Pre-petition Grievances, an executed copy of which is in each of the Parties' possession (the "July 27, 2017 Settlement Agreement") and which is available for review by the Court, should the Court find such review necessary.

4. Because all of the Pre-petition Grievances have been resolved under the July 27, 2017 Settlement Agreement, the Parties agree that: (a) the DPOA's right to relief for any of the Pre-petition Grievances is governed by the Parties' July 27, 2017 Settlement Agreement; (b) Claim No. 1869 should be withdrawn as moot; and (c) as a result of the withdrawal of Claim No. 1869, the DPOA and its members will have no right to receive any distribution in these bankruptcy proceedings based on Claim No. 1869.
5. This Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Stipulation and the July 27, 2017 Settlement Agreement, including, but not limited to, the enforcement of the terms of the July 27, 2017 Settlement Agreement.

WHEREFORE, the parties request the Court enter an Order in the form attached hereto as Exhibit A.

STIPULATED AND AGREED:

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-and-

-and-

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August 2, 2017

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

----- X  
:  
In re :: Chapter 9  
:: Case No. 13-53846  
CITY OF DETROIT, MICHIGAN, :: Hon. Thomas J. Tucker  
Debtor. :  
----- X

**ORDER WITHDRAWING  
DPOA CLAIM #1869 AS MOOT**

This case is before the Court on the stipulation filed on August 7, 2017 (Docket # \_\_\_\_\_, the Stipulation) entitled “Stipulation for Order Withdrawing DPOA Claim #1869 as Moot.” Based on the Stipulation,

IT IS ORDERED THAT Claim No. 1869 filed on behalf of the Detroit Police Officers Association is withdrawn as moot.

IT IS FURTHER ORDERED THAT as a result of the withdrawal of Claim No. 1869, the Detroit Police Officers Association and its members will have no right to receive any distribution in these bankruptcy proceedings based on Claim No. 1869.

IT IS FURTHER ORDERED THAT this Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order and

the July 27, 2017 Settlement Agreement, including, but not limited to, the enforcement of the terms of the July 27, 2017 Settlement Agreement.